

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

OPTIS WIRELESS TECHNOLOGY, LLC,
OPTIS CELLULAR TECHNOLOGY, LLC,
UNWIRED PLANET, LLC, UNWIRED
PLANET INTERNATIONAL LIMITED,
AND PANOPTIS PATENT
MANAGEMENT, LLC.,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 2:19-CV-0066-JRG

JURY TRIAL DEMANDED

**JOINT MOTION TO CONDUCT
AN EXPERT DEPOSITION AFTER CLOSE OF EXPERT DISCOVERY**

Defendant Apple Inc. and Plaintiffs Optis Wireless Technology, LLC, Optis Cellular Technology, LLC, Unwired Planet, LLC, Unwired Planet International Limited, and PanOptis Patent Management, LLC (collectively, “the parties”) respectfully move for leave to conduct an expert deposition after close of expert discovery.

On June 9, 2020, the Court granted the parties’ motion to conduct five expert depositions after the close of expert discovery. Dkt. 158. The parties have completed four of the expert depositions as set forth in that order; however, the parties were unable to schedule the deposition of Plaintiffs’ expert Antonio Viridis by July 17, 2020, as set forth in the Court’s order. Dr. Viridis was not available to travel for his deposition in light of the COVID-19 pandemic and other personal circumstances prior to July 29, 2020. In accommodation of Dr. Viridis’ travel restrictions, the parties have scheduled his deposition to take place after he arrives in London on

July 29, 2020. Therefore, the parties request leave to conduct the deposition of Dr. Viridis on July 29, 2020.

Dated: July 24, 2020

/s/ Samuel F. Baxter

Samuel F. Baxter (Tex. Bar No. 01938000)
sbaxter@mckoolsmith.com
Jennifer Truelove (Tex. Bar No. 24012906)
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 East Houston, Suite 300
Marshall, TX 75670
Telephone: 903-923-9000
Facsimile: 903-923-9099

Steven Pollinger (Tex. Bar No. 24011919)
spollinger@mckoolsmith.com
MCKOOL SMITH, P.C.
300 W. 6th St., Suite 1700
Austin, TX 78701
Telephone: 512-692-8700
Facsimile: 512-692-8744

Holly Elin Engelmann
hengelmann@mckoolsmith.com
McKool Smith PC - Dallas
300 Crescent Court
Suite 1500
Dallas, TX 75201
214/978-4205
Fax: 214/978-4044

Jason Sheasby (pro hac vice)
jsheasby@irell.com
Hong Zhong, PhD
hzhong@irell.com
IRELL & MANELLA LLP
1800 Ave of the Stars, Suite 900
Los Angeles, CA 90064
Telephone: 310-203-7096
Facsimile: 310-203-7199

*Attorneys for Plaintiffs Optis Wireless
Technology, LLC, Optis Cellular Technology,
LLC, Unwired Planet, LLC, Unwired Planet
International Limited, and PanOptis Patent
Management, LLC*

Dated: July 24, 2020

/s/ Mark D. Selwyn

Mark D. Selwyn (*pro hac vice*)
mark.selwyn@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

Mindy Sooter (*pro hac vice*)
mindy.sooter@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
1225 Seventeenth Street, Suite 2600
Denver, CO 80202
Telephone: (720) 274-3135
Facsimile: (720) 274-3133

Joseph J. Mueller (*pro hac vice*)
Timothy D. Syrett (*pro hac vice*)
timothy.syrett@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Brittany Blueitt Amadi (*pro hac vice*)
brittany.amadi@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

Melissa R. Smith
State Bar No. 24001351
melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Defendant's counsel of record were served with a true and correct copy of the foregoing document by electronic mail on July 24, 2020.

/s/ Samuel F. Baxter

Samuel F. Baxter